

From: [Rinaldi, Gerald M](#)
To: [Watson, Rob](#)
Cc: [Bumb, Cathleen S](#); [Smith, Steven D](#); [Haddock, Mark](#); [Ken Berry - URS](#); [Steve.Nightingale@illinois.gov](#); [Moore, James K.](#); [Myers, Terri](#); [Smith, Clarence](#); [Carson, Robert](#); [Lake, Paul](#); [Cisneros, Jose](#); [Bardo, Kenneth](#); [Tanaka, Joan](#); [Linebaugh, Stephanie Ball](#)
Subject: RE: Solutia Letter regarding the Judith Lane Containment Cell
Date: Tuesday, April 9, 2013 2:25:44 PM
Attachments: [20130409 Solutia Letter to IEPA.pdf](#)

Attached is the subject letter in response to your e-mail below.

Please let me know when IEPA expects to complete its review of the revised RAPP application that Solutia submitted on March 30, 2012.

G. M. (Jerry) Rinaldi - 2S
Solutia Inc.
575 Maryville Centre Drive
St. Louis, MO 63141
Phone 314-674-3312
Fax 314-674-8808
E-mail gmrina@solutia.com

From: Watson, Rob [<mailto:Rob.Watson@illinois.gov>]
Sent: Thursday, March 28, 2013 1:50 PM
To: Rinaldi, Gerald M
Cc: Nightingale, Steve; Moore, James K.; Myers, Terri; Smith, Clarence; Carson, Robert; Lake, Paul; 'bardo.kenneth@epamail.epa.gov'
Subject: Solutia Letter regarding the Judith Lane Containment Cell

Jerry,

Per our discussion on March 21, 2013, Solutia needs to send a letter to the Agency describing Solutia's desire to transfer the regulation of the Judith Lane Containment Cell (JLCC) from CERCLA to RCRA before we can resume the review of the RCRA Remedial Action Plan Permit (RAPP) application for the JLCC. As this letter may be viewed by others who are not very familiar with the JLCC, the letter should include the following:

- A brief history – How we got to this point.
- The current conditions – How the JLCC is currently regulated as part of the Sauget Area 1 Sites under CERCLA.
- Solutia's desire to transfer full regulation of the JLCC from CERCLA to RCRA.
- Future conditions – How the JLCC would be regulated under RCRA including closure/post-closure, groundwater monitoring, and financial assurance.
- Legal responsibility for the JLCC and the wastes in it – Identify the owner and operator of the JLCC, who owns and is legally liable for the CERCLA wastes already in the JLCC, and the owner of the wastes that Solutia intends to place in the JLCC once the RAPP is issued.
- A scale drawing that identifies the Sauget Area 1 Sites, the JLCC, and the W.G. Krummrich Plant.

Please refer to the BOL site ID number for the JLCC (1630200005) and the log number for the RAPP application (B-205) in your letter. The letter should be addressed to:

Steve Nightingale, P.E.
Manager, Permit Section
Bureau of Land, Mail Code #33
Illinois EPA
1021 North Grand Ave East
PO Box 19276

Springfield, IL 62794-9276

Finally, as previously noted, this letter from Solutia is necessary for the Agency to resume its review of the RCRA RAPP application for the JLCC.

As always, please let me know if you have any questions regarding this email.

*Rob Watson, P.E.
Senior Engineer, RCRA Unit
Permit Section, Bureau of Land
Illinois EPA
217.524.3265*

Rob.Watson@illinois.gov

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